

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**Master File No. 1:00-1898  
MDL NO. 1358 (SAS)  
M21-88**

In re: Methyl Tertiary Butyl Ether ("MTBE")  
Products Liability Litigation

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**This Document Relates To:**

*California-American Water Company v. Atlantic  
Richfield Company, et al.*, S.D.N.Y. No. 04-Civ.  
4974 (SAS)

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**PLAINTIFF CALIFORNIA-AMERICAN WATER COMPANY'S PRELIMINARY  
DISCLOSURE OF SOURCES OF MTBE CONTAMINATION**

Pursuant to Case Management Order No. 71, Plaintiff California-American Water Company hereby makes the following preliminary disclosure of sources of MTBE<sup>1</sup> contamination in Plaintiff's wells. This initial disclosure is made with the following reservations expressly stated:

1. Discovery in this matter is ongoing. Plaintiff may discover that additional stations/facilities are substantial factors in causing MTBE contamination in Plaintiff's wells and Plaintiff reserves the right to supplement or amend this list accordingly.
2. Plaintiff reserves all rights to supplement or amend this disclosure.
3. By making this disclosure, Plaintiff is in no way representing that all of the sources of MTBE in Plaintiff's wells are identified below. There may be orphan plumes emanating

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<sup>1</sup> As used herein "MTBE" refers to methyl tertiary butyl ether and its degradation byproducts including tertiary butyl alcohol.

from fugitive tanks, surface spills or other unaccounted for sources that are not discoverable based on a reasonable investigation.

4. This disclosure is made upon information reasonably available from publicly available sources. Plaintiff hereby reserves the right to supplement or amend this disclosure as a result of obtaining additional information as it prepares for trial.
5. Expert discovery has not yet commenced. Plaintiff hereby reserves the right to supplement or amend this disclosure as a result of the expert discovery process.
6. Expert disclosures are not due yet. This disclosure is not and is in no way intended to be an expert disclosure.

Subject to and without waiving the limitations and reservations set forth above, Plaintiff hereby responds as follows:

<b>Site Name<sup>2</sup></b>	<b>Address</b>	<b>City</b>
<b><i>Monterey Area</i></b>		
CARMEL VALLEY RANCH/ CARMEL VALLEY RANCH GOLF COURSE	1 OLD RANCH RD	CARMEL
MID VALLEY FIRE PROJECT DIST	8455 CARMEL VALLEY RD	CARMEL VALLEY
<b><i>Los Angeles Area</i></b>		
20TH CENTURY PLASTICS	3628 CRENSHAW BLVD	LOS ANGELES
76 STATION #0914	5816 WESTERN AVE. S.	LOS ANGELES
76 STATION 2439	3774 WESTERN AVENUE, SOUTH	LOS ANGELES
ANGELUS FUNERAL HOME	3875 CRENSHAW BLVD	LOS ANGELES
ARCO #0027	3412 CRENSHAW BLVD S	LOS ANGELES
ARCO #0176	5804 CRENSHAW BLVD	HYDE PARK
ARCO #0177	4371 CRENSHAW BLVD	LOS ANGELES
ARCO #71267	1515 MARTIN LUTHER KING BLVD	LOS ANGELES

<sup>2</sup> Please note that certain locations may have undergone name changes and/or may have been converted to different uses. These names are provided for convenience and should not be read as a limitation.

ARCO FACILITY NO. 108	3775 VERMONT AVENUE	LOS ANGELES
BOB EARLY BRAKES	2070 SLAUSON AVE W	LOS ANGELES
BOB'S BRAKE & TIRE SERVICE	3902 SLAUSON AVE W	VIEW PARK-WINDSOR HILLS
BOYD PETERSON	3833 CRENSHAW BLVD	CRENSHAW
CHESTERFIELD SQUARE	1816 W SLAUSON AVE	LOS ANGELES
CHEVRON #9-2748	3405 ARLINGTON AVE S	JEFFERSON PARK
CHEVRON #9-7757	4004 VERMONT AVE S	LOS ANGELES
CRENSHAW CAR WASH	3518 CRENSHAW BLVD	LOS ANGELES
DR. PICKETT'S PROPERTY	1885 SLAUSON AVE. W	LOS ANGELES
DUDLEYS FRIENDLY AUTO REPAIR	6556 WESTERN AVE S	LOS ANGELES
FIRESTONE/ROD DAVIS PROPERTY	5300 CRENSHAW BLVD	HYDE PARK
FORMER CRENSHAW COLLISION CENTER	6530 CRENSHAW BLVD. E.	LOS ANGELES
FOUNDATION FOR THE JR. BLIND	5300 ANGELES VISTA BLVD	WINDSOR HILLS
GOOD HUMOR-BRYERS ICE CREAM	1900 SLAUSON AVE W	LOS ANGELES
JAMES LEE SERVICE CENTER	3950 MARTIN LUTHER KING BL.	LOS ANGELES
JOHN D JONES SHOPPING CENTER	4501 MARTIN LUTHER KING BLVD	LOS ANGELES
JOHN'S AUTO CENTER	4081 MARLTON AVE	LOS ANGELES
LA COUNTY FIRE STATION #38	3907 W 54TH ST	LOS ANGELES
LEE'S ARCO SMOG PROS	5804 CRENSHAW BLVD	LOS ANGELES
LEIMERT AUTO SERVICE	4376 LEIMERT BLVD.	LOS ANGELES
MERCURY O'CONNOR	3737 CRENSHAW BLVD	LOS ANGELES
MOBIL #11-LVC	1355 MARTIN LUTHER KING BLVD	LOS ANGELES
MOBIL #17-489	3950 MARTIN LUTHER KING BLVD W	LOS ANGELES
NIK CONSTRUCTION CO.	4251-4261 S VERMONT AVE	LOS ANGELES

PARK LABREA PROJ (PARCELS A&B)	6220 Third	LOS ANGELES
PIZZA HUT SITE #11-7488	1851 SLAUSON AVE. W.	LOS ANGELES
SHELL	5805 CRENSHAW BOULEVARD	LOS ANGELES
SHELL	1010 MARTIN LUTHER KING BLVD	LOS ANGELES
SHELL #204-4531-8106	4044 MARTIN LUTHER KING BLVD	LOS ANGELES
SHELL #204-4539-5401/ SHELL SERVICE STATION	4404 WESTERN AVE S	LOS ANGELES
SHELL SERVICE STATION	2215 MARTIN LUTHER KING JR. BLVD. W.	LOS ANGELES
SHELL SERVICE STATION	3645 CRENSHAW BLVD. S.	LOS ANGELES
SLAUSON GAS & MART	3708 SLAUSON AVE W	LOS ANGELES
SOUTH SEWER MAINT YARD	2002 SLAUSON AVE W	HYDE PARK
SOUTHLAND CORP #20545	4343 SLAUSON AVE W	LOS ANGELES
SOUTHWEST STREET MAINT YARD	5860 WILTON PL S	LOS ANGELES
THRIFTY #242	4200 CRENSHAW BLVD	LOS ANGELES
THRIFTY PAYLESS	5701-5749 CRENSHAW BLVD	LOS ANGELES
UNOCAL #3224	3555 MARTIN LUTHER KING BLVD	LOS ANGELES
VACANT	1900 SLAUSON AVE W	LOS ANGELES
VACANT BUILDING	5700 S WESTERN AVE	LOS ANGELES
VENICE MAINT. YARD	2000 ABBOT KINNEY BLVD	JEFFERSON PARK
VONS/FORMER JERSEYMAID MILK	1040 SLAUSON AVE W	LOS ANGELES
WESTSIDE ARCO NO. 1	3412 CRENSHAW BLVD	LOS ANGELES

Dated: San Francisco, California  
June 7, 2010

/s/ NICHOLAS G. CAMPINS  
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*Attorneys for Plaintiff California-American Water Company*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of  
**PLAINTIFF CALIFORNIA-AMERICAN WATER COMPANY'S PRELIMINARY  
DISCLOSURE OF SOURCES OF MTBE CONTAMINATION**  
was served on Liaison Counsel via Electronic Mail, and on all counsel of record by posting it  
directly to CM/ECF and LexisNexis File & Serve on the 7th day of June, 2010.

\_\_\_\_\_*BEVERLY SANTOS*\_\_\_\_\_  
BEVERLY SANTOS